

EXHIBIT 99

Highly Confidential - Subject to Further Confidentiality Review

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -

5 IN RE: NATIONAL : MDL NO. 2804
6 PRESCRIPTION OPIATE :
7 LITIGATION :

8 -----
9 : CASE NO.
10 THIS DOCUMENT : 1:17-MD-2804
11 RELATES TO ALL CASES:
12 : Hon. Dan A.
13 : Polster
14 - - -

15 Tuesday, December 4, 2018
16 - - -

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18 CONFIDENTIALITY REVIEW
19 - - -

20 Videotaped deposition of
21 LISA WALKER, taken pursuant to notice,
22 was held at Golkow Litigation Services,
23 One Liberty Place, 1650 Market Street,
24 Suite 5150, Philadelphia, Pennsylvania
25 19103, beginning at 9:12 a.m., on the
26 above date, before Amanda Dee
27 Maslynsky-Miller, a Certified Realtime
28 Reporter.
29 - - -

30 GOLKOW LITIGATION SERVICES
31 877.370.3377 ph | 917.591.5672 fax
32 deps@golkow.com
33 - - -

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<p style="text-align: right;">Page 270</p> <p>1 Q. And then do you see below 2 that Mr. Shaffer has reproduced the 3 customer questionnaire, and he's got some 4 comments in there as well? 5 Do you see that? 6 A. Selling products -- yes, I 7 see that. 8 Q. And it seems that Mr. 9 Shaffer left you a voicemail with his 10 comments as well? 11 A. That's what the e-mail 12 states. 13 Q. Did you have interactions 14 with regulatory and Qualitest relating to 15 suspicious order practices? 16 A. Not that I recall. 17 Q. Is Mr. Shaffer in regulatory 18 at Qualitest? 19 A. I do not believe he was, no. 20 Q. What group was he in? 21 A. I believe he was part of 22 transportation or security, if I remember 23 correctly. 24 Q. Okay.</p>	<p style="text-align: right;">Page 272</p> <p>1 questionnaire, fair? 2 A. Based on what the e-mail 3 states. 4 Q. I want to go down to 5 hotspots, Item 3. By 2012, the CDC had 6 already identified the opioid crisis as 7 an epidemic. 8 Are you aware of that, 9 ma'am? 10 MR. LIMBACHER: Object to 11 form. 12 THE WITNESS: I knew there 13 was an epidemic. I couldn't tell 14 you the year. 15 BY MR. BUCHANAN: 16 Q. By 2012, had you, within 17 Endo, identified hotspots for 18 diversion-related activity? 19 MR. LIMBACHER: Object to 20 form. 21 THE WITNESS: I can't speak 22 to other parts of Endo. 23 BY MR. BUCHANAN: 24 Q. I'm just asking within --</p>
<p style="text-align: right;">Page 271</p> <p>1 A. I could be wrong. But I 2 don't know. 3 Q. If we scroll down, do you 4 see the version of the questionnaire that 5 Mr. Shaffer commented on, correct? 6 A. Uh-huh. 7 Q. In his e-mail to you dated 8 July 25, 2012, right? 9 A. Yes. 10 MR. LIMBACHER: Object to 11 form. It's an e-mail to Tracey 12 Hernandez. 13 MR. BUCHANAN: I'm sorry. 14 THE WITNESS: Sorry. 15 BY MR. BUCHANAN: 16 Q. It was an e-mail from Mr. 17 Shaffer to Tracey Hernandez that was 18 forwarded to you a few weeks later, 19 correct? 20 A. Yes. 21 Q. Okay. All right. So in 22 this e-mail between Mr. Shaffer and Ms. 23 Hernandez that was forwarded to you, Mr. 24 Shaffer has got some comments on the</p>	<p style="text-align: right;">Page 273</p> <p>1 A. But, I mean, yes, we knew -- 2 I knew -- 3 Q. Let me ask the question. 4 A. -- that there was an opioid 5 epidemic, but I can't speak to other 6 areas within Endo. 7 Q. This particular 8 questionnaire, 3, What geographic areas 9 will you be primarily distributing 10 product to, hotspot locations, Florida, 11 et cetera, equals H. 12 Do you see that? 13 A. I do. 14 Q. Did you recognize Florida as 15 a hotspot with regard to the opioid 16 epidemic in 2012, ma'am? 17 MR. LIMBACHER: Object to 18 form. 19 THE WITNESS: This 20 information that you're looking at 21 is regarding to our generics 22 division. I can't speak to 23 anything. This is generics. 24 Larry and Tracey are part of</p>

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<p style="text-align: right;">Page 274</p> <p>1 our generics division. I can't 2 speak to any of this. 3 BY MR. BUCHANAN: 4 Q. So stay with me just on the 5 branded side, then. 6 As just a factual matter, in 7 2012, had you in the branded side 8 identified Florida as a hotspot location? 9 MR. LIMBACHER: Object to 10 form. 11 THE WITNESS: We knew that 12 there was opioid epidemics 13 throughout the country. I can't 14 confirm or deny -- I can't confirm 15 if we identified Florida back in 16 2012. 17 BY MR. BUCHANAN: 18 Q. Okay. Larry's comment here 19 says, Suggest: Hotspot locations, and he 20 lists Florida. 21 Do you see that? 22 A. I do see Florida. 23 Q. Texas? 24 A. Yes.</p>	<p style="text-align: right;">Page 276</p> <p>1 Q. I'm asking you a question, 2 though. 3 Do you understand that 4 there's only an opioid epidemic with 5 regard to generic drugs? 6 A. I know -- 7 MR. LIMBACHER: Object to 8 form. 9 THE WITNESS: I know that 10 there's an opioid epidemic 11 throughout the country. 12 BY MR. BUCHANAN: 13 Q. And you all were making 14 opioid branded drugs, right, in the Endo 15 Pharmaceuticals arm, correct? 16 MR. LIMBACHER: Object to 17 form. 18 THE WITNESS: There's 19 branded opioid products, correct. 20 BY MR. BUCHANAN: 21 Q. At this point in time, you 22 were making Opana ER, right? 23 A. Yes. 24 Q. Opana?</p>
<p style="text-align: right;">Page 275</p> <p>1 Q. Kentucky? 2 A. I see that on your document. 3 Q. Tennessee. 4 Do you see that? 5 A. Yes. 6 Q. California? 7 A. Yes. 8 Q. Illinois? 9 A. Correct. I see it. 10 Q. Nevada? 11 A. Yes. But this is generics, 12 again. 13 Q. All equals high, correct? 14 A. But this is generics. 15 Q. Do you understand that 16 there's only an opioid epidemic with 17 regard to generic drugs, ma'am? 18 MR. LIMBACHER: Object to 19 form. Argumentative. 20 THE WITNESS: No. What I'm 21 trying to tell you is I can't 22 speak to this document. This has 23 to do with generics. 24 BY MR. BUCHANAN:</p>	<p style="text-align: right;">Page 277</p> <p>1 A. Yes. 2 Q. Percocet? 3 A. Yes. 4 Q. Selling hundreds of millions 5 of pills every year? 6 A. I can't speak to the 7 number -- 8 MR. LIMBACHER: Object to 9 form. 10 THE WITNESS: -- to the 11 number of pills. 12 BY MR. BUCHANAN: 13 Q. Would you dispute that you 14 were selling hundreds of millions of 15 pills every year, ma'am? 16 A. I don't -- 17 MR. LIMBACHER: Object to 18 form. 19 THE WITNESS: I don't know 20 the number of pills. 21 BY MR. BUCHANAN: 22 Q. As part of your suspicious 23 order monitoring practice, ma'am, did you 24 look at hotspot locations and evaluate</p>

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<p style="text-align: right;">Page 278</p> <p>1 your customers in particular with regard 2 to hotspot locations? 3 MR. LIMBACHER: Object to 4 form. 5 THE WITNESS: We had an SOM 6 program in place at both Endo and 7 UPS at that 2012. 8 BY MR. BUCHANAN: 9 Q. Okay. For example, did you 10 do any due diligence on your customers in 11 Florida? 12 A. We had our SOM program in 13 place that looked at all orders. 14 Q. Did you go and visit any 15 customers in Florida? 16 MR. LIMBACHER: Object to 17 form. 18 THE WITNESS: Did Endo? 19 Endo did not. But as I stated 20 before, our Qualitest group 21 visited customers. 22 BY MR. BUCHANAN: 23 Q. Not in 2012? 24 MR. LIMBACHER: Object to</p>	<p style="text-align: right;">Page 280</p> <p>1 what your counsel -- you and your counsel 2 discussed getting ready for today. 3 What's the earliest point in 4 time you have knowledge about Qualitest's 5 SOM practices, ma'am? 6 MR. LIMBACHER: Object to 7 form. 8 THE WITNESS: I can't speak 9 to Qualitest's SOM practice. 10 BY MR. BUCHANAN: 11 Q. That's what I thought. 12 So with regard to branded's 13 practices, as of 2012, were you all 14 conducting due diligence visits on the 15 Florida customers? 16 MR. LIMBACHER: Object to 17 form. Asked and answered. 18 THE WITNESS: As I stated 19 before, we had an SOM program in 20 place at both Endo and at UPS, and 21 that's how we reviewed our orders. 22 BY MR. BUCHANAN: 23 Q. Okay. And to answer my 24 question, though, were you conducting due</p>
<p style="text-align: right;">Page 279</p> <p>1 form. 2 THE WITNESS: I don't know 3 the exact date when they did. 4 BY MR. BUCHANAN: 5 Q. Right. Well, do you know 6 any of what Qualitest did, ma'am, other 7 than what you've been told in connection 8 with getting ready for today? 9 MR. LIMBACHER: Object to 10 form. 11 MR. BUCHANAN: I don't want 12 privileged. 13 MR. LIMBACHER: I would 14 object to the statement by 15 counsel. 16 BY MR. BUCHANAN: 17 Q. I'm assuming you spoke to 18 counsel to get ready for today, right? 19 MR. LIMBACHER: And we've 20 covered that already. Just, if 21 you could, rephrase your question, 22 please, counsel. 23 BY MR. BUCHANAN: 24 Q. I don't want you to tell me</p>	<p style="text-align: right;">Page 281</p> <p>1 diligence visits on your Florida 2 customers in 2012? 3 MR. LIMBACHER: Object to 4 form. Asked and answered. 5 THE WITNESS: And within my 6 role, no. But I can also not -- I 7 cannot speak to if anybody else 8 within Endo did anything within 9 the state of Florida. 10 BY MR. BUCHANAN: 11 Q. Okay. As I understand it 12 with regard to suspicious order 13 monitoring, that was your function within 14 the branded side, correct? 15 A. Right. 16 MR. LIMBACHER: Object to 17 form. 18 BY MR. BUCHANAN: 19 Q. Did you ever conduct any due 20 diligence visits to Texas in 2012? 21 MR. LIMBACHER: Object to 22 form. Asked and answered. 23 THE WITNESS: Within my 24 role, no. But that doesn't</p>

